

THE OFFICE OF REGULATORY STAFF

REBUTTAL TESTIMONY

OF

MICHAEL L. SEAMAN-HUYNH

OCTOBER 24, 2018



DOCKET NOS. 2017-207-E;  
2017-305-E AND 2017-370-E

Request of the Office of Regulatory Staff for Rate  
Relief to South Carolina Electric & Gas Company's  
Rates Pursuant to S.C. Code Ann. § 58-27-920

**REBUTTAL TESTIMONY OF**

**MICHAEL L. SEAMAN-HUYNH**

**ON BEHALF OF**

**THE SOUTH CAROLINA OFFICE OF REGULATORY STAFF**

**DOCKET NOS. 2017-207-E; 2017-305-E AND 2017-370-E**

**IN RE: REQUEST OF THE OFFICE OF REGULATORY STAFF FOR RATE**

**RELIEF TO SOUTH CAROLINA ELECTRIC & GAS COMPANY'S RATES**

**PURSUANT TO S.C. CODE ANN. § 58-27-920**

**Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS AND OCCUPATION.**

**A.** My name is Michael Seaman-Huynh. My business address is 1401 Main Street, Suite 900, Columbia, South Carolina 29201. I am employed by the State of South Carolina as a Senior Regulatory Manager in the Utility Rates and Services Division of the Office of Regulatory Staff ("ORS").

**Q. DID YOU PREVIOUSLY SUBMIT DIRECT TESTIMONY AND EXHIBITS IN DOCKET NO. 2017-370-E?**

**A.** Yes. I submitted direct testimony and exhibits in Docket No. 2017-370-E which has been consolidated for hearing purposes with Docket No. 2017-305-E. My direct testimony and exhibits filed in Docket No. 2017-370-E address issues raised by South Carolina Electric & Gas Company ("SCE&G") witnesses.

**Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY FILED IN DOCKET NO. 2017-370-E?**

**A.** The purpose of my direct testimony is to address certain areas of the ORS's examination of the joint application and petition of SCE&G and Dominion Energy,

Incorporated (“Dominion”) (together the “Applicants”) in Docket No. 2017-370-E (“Application”). My testimony will address several topics including:

- An overview of SCE&G’s natural gas operations in South Carolina;
- ORS’s recommendations regarding natural gas operations should the merger be approved;
- ORS’s review of the Application regarding rates and riders;
- ORS’s recommendations regarding its base rate reduction, capital cost recovery rider, tax savings rider, and merger savings rider under the ORS Optimal Rate Payer Benefits Plan;
- ORS’s recommendation regarding the Applicants’ proposed rate credit to customers; and,
- A comparison of the three (3) plans proposed by SCE&G and Dominion to the Optimal Plan proposed by ORS and the impacts of each proposal on customers.

**Q. DO YOU HAVE ANY CHANGES TO YOUR DIRECT TESTIMONY PRE-FILED IN DOCKET NO. 2017-370-E AFTER REVIEW OF THE DIRECT TESTIMONY FILED BY SCE&G IN DOCKET NO. 2017-305-E?**

**A.** No. After my review of the direct testimony filed by SCE&G witnesses, the conclusions and recommendations remain unchanged as presented in my pre-filed direct testimony in Docket No. 2017-370-E and are also applicable in Docket No. 2017-305-E. I am hereby adopting by reference in Docket No. 2017-305-E the testimony and exhibits which I have previously pre-filed in Docket No. 2017-370-E.

**Q. WILL YOU UPDATE YOUR TESTIMONY BASED ON INFORMATION THAT BECOMES AVAILABLE?**

1 A. Yes. ORS fully reserves the right to revise its recommendation via supplemental  
2 testimony should new information become available to ORS not previously provided by  
3 the Applicants, or from pending state and federal investigations and lawsuits.

4 Q. **DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?**

5 A. Yes, it does.